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March 11, 2013

Ms. Marlene H. Dortch
Secretary to the
Federal Communications Commission
Washington, D.C. 20554

Re: *Ex Parte* Communication- Next Generation (NG) 9-1-1
PS Docket No. 10-255, PS Docket 11-60, PS Docket No. 11-153 and PS Docket 12-333

Dear Ms. Dortch:

On March 8, 2013, on behalf of Agero, Inc., Gary Wallace, Vice President for Corporate Relations, and I met with members of the Public Safety and Homeland Security Bureau. Representing the Bureau were David Furth, Henning Schulzrinne, Erika Olsen, Timothy May, David Siehl, Dana Zelman, Eric Schmidt, Aaron Garza and Jerome Stanshine. Ms. Olsen, Ms. Zelman and Mr. Stanshine participated via conference bridge.

Agero, Inc., a member of the Cross Country Group of companies, provides connected vehicle or telematics services to several automobile manufacturers and their vehicles owners. During the discussion, we summarized Agero efforts addressing NG 9-1-1 and the role of telematics in the emergency response environment. A white paper outlining these efforts was provided and is attached.

Respectfully,

Attachment
Copy to: Mr. Furth, Mr. Schulzrinne, Ms. Olsen, Mr. May, Mr. Siehl, Ms. Zelman, Mr. Schmidt, Mr. Garza and Mr. Stanshine

THE AUTOMOBILE AND EMERGENCY COMMUNICATIONS
The Vehicle as an Emerging Communications Platform

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March 2013

THE AUTOMOBILE AND EMERGENCY COMMUNICATIONS
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Agero's Role in the Emergency Environment

With the capability to aggregate "crowd-sourced" information from motorists in location-enabled "connected" (telematics-enabled) vehicles and to communicate directly with primary Public Safety Answering Points (PSAPs) across the US and Canada, the growing network of telematics call centers loom as a potentially critical resource during wide-scale emergencies, the catastrophic incident, natural disasters or extreme, adverse weather.

This note offers a glimpse into the potential future of a Next Generation 911 (NG 911) environment that would include the harmonizing of public and private emergency response networks during such situations.

Agero is a leading provider of telematics (or TSP, telematics service provider), roadside assistance and insurance claim management services to automobile manufacturers and auto insurance carriers, responding to over 6 million vehicle-related emergency incidents annually through a network of six, redundant call and data centers with a combined staff of 2,300 located throughout the US and Canada.

The June 2012 Northeast derecho disrupted 911 service, particularly in the Washington, D.C. area, profiling the fragile and bifurcated character of current emergency communications. With millions in public investment committed to 911, Northern Virginia jurisdictions were unable during the incident to resolve carrier failure to transmit 911 calls. The circumstance emphasized the silo-like nature of the current 911 system and reaffirms the need for NG 911 to more robustly integrate and support broad offerings and connectivity. NG 911 envisions a platform where a range of services can summon emergency response. Agero currently deploys key components of NG 911's core elements. Today, Agero integrates into a single platform varied services, multiple interfaces (in-vehicle, handset/tablet apps, web portals), and cloud-based databases for motorists. In the near future, it is expected these functions will be managed inside the vehicle – safely (mitigating driver distraction), and systems will process data generated by both vehicle and vehicle owner.

Instead of awaiting NG 911 natural and uncertain evolution, Agero proposes that the Federal Communications Commission engage in a collaborative discussion with the PSAP and automotive telematics community to determine the best future path for public-private collaboration during emergencies, particularly those affecting a broad area.

The Connected Vehicle

The automobile is now a location-enabled communications platform that includes linkage to 911. As such, emergency communicators and responders should leverage this connection to accelerate and enhance response to vehicular injury accidents; recovery of stolen vehicles; and, in the near future, to assist in location-specific notification to drivers of diversion of normal

traffic flows, and aggregation of diverse, mobile eyewitness reports during severe natural or unique emergencies.

Vehicle connectivity can expand the emergency communications infrastructure. It can marshal added capabilities for emergency planners needing information to immediately assess the scope and nature of an emergency. It will provide a targeted channel for disseminating information and direction to the public through the vehicle -- critical in many natural disasters in which the vehicle becomes a temporary refuge for shelter, electrical power, and potentially two-way communication.

Initial Contribution to Emergency Response

The connected vehicle can promote emergency response in two fundamental ways. The first is as a primary source of incident information. During wide-scale emergencies, the catastrophic incident, natural disaster or extreme adverse weather, motorists in telematics-equipped vehicles contribute immediate and localized intelligence to the 911 network hub. Telematics vehicles can provide response managers with real-time snapshots of evolving emergency situations at the overview and detail level. For instance, during outbreaks of wildfires in California, it is common for drivers to voluntarily report from their specific location where fire lines have advanced, where dense smoke is degrading highway visibility, or roadways suddenly closed by advancing fire brigades. This information enables 911 centers to focus on immediate risk and/or injury to allocate resources more effectively.

Today, this information can be most readily collected as driver/eyewitness accounts but increasingly is supplemented by Bluetooth connectivity, providing drivers with a more robust pipe for Smartphone or tablet features, such as wireless transmission of photos and video. Currently, few PSAPs can receive such digital-based information. As vehicles become outfitted with cameras associated with advanced driver assistance systems and technology that promises to enable vehicle-to-vehicle communications and route-specific surface weather conditions, the ability to enhance emergency response and public safety increase as well.

The connected vehicle ecosystem will also be able to play a role in circumstances where core 911 services become non-existent or severely challenged. With access to every US/Canada PSAP, Agero's network of response centers, staffed with personnel specifically trained to communicate with individuals confronted with an emergency, can assume some form of temporary, intermediary role. Response centers can receive information and transmit to either the appropriate secondary emergency response entity or a temporary dispatch command, while remaining with the 911 caller. The emergence of the connected vehicle, and the data-centric infrastructure that supports it, provides a partial remedy when carrier default shuts down 911.

Telematics centers like Agero's also envision a communications channel that no current 911 Center envisions - a vehicular version of the Emergency Notification System (ENS) – a geo-fenced or route-specific alert to drivers in their vehicles. This could not only be used to warn drivers of potential threats to their safety on the route ahead or in their general area (i.e. black ice, hail, dense fog or smoke, blowing snow, an area cordoned off due to a potential explosion or chemical leak), but to provide guidance to hurricane evacuation routes, necessary facilities along those routes, or directions around fast-spreading forest or range fires. In fact, past experiences

with natural disasters and house fires, find that the family vehicle, with its access to immediate shelter, electrical power, controlled climate, and, now communications, often becomes a temporary refuge.

Challenges-Present and Future

The focus of the 911 infrastructure, including personnel, is solely on emergency calls transmitted to a central facility and from there to dispatch- police, fire or emergency medical. The nation's 911 system remains voice centric. Emergency messages via text, email, or social media continue to remain a vision for most 911 centers. Telematics response centers represent a transitional bridge to widespread NG 911 deployment, similar to its role with highway emergencies prior to the broad deployment of location-enabled "e911" capabilities.

If NG 911 means anything, various services and applications must be able to summon emergency response through one platform – a platform that addresses the gaps in the redundancy and resiliency of current infrastructure and a flexible interface with ever advancing technology. Agero's connected vehicle infrastructure, and the expertise its response specialist possess, present a potential, valuable and unique path beyond the historic 911 model. It affords 911 centers an approach to access and leverage the technology and efficiencies of a business relying on services beyond the location-enabled interface with 911.

Despite this potential, a range of issues complicate that interface between the TSP and 911 networks. Among these include:

- No ubiquitous data path into all PSAP platforms.
- In most locales, no direct voice path exists for TSP emergency calls – even those triggered by an airbag deployment – into 911 trunks through local exchange carriers.
- Variance among states in identification of a telematics call type classification. In some states and localities, a TLMA call type classification immediately identifies to the 911 call taker that the incoming emergency call stems from a vehicle and has likely been filtered by a TSP as a bona fide emergency requiring priority response. Most jurisdictions, however do not offer such classification and in some locations, route telematics emergencies to non-priority alarm lines.
- Similarly, in most locales, TSP call takers undergo radically different training than 911 call takers even though safety-related training are grounded on APCO Institute requirements. Likewise, TSPs don't enjoy the limited liability provisions that PSAP call operations possess.

In short, 911's central mission to fulfill a universal public safety obligation and TSPs' primary responsibility to deliver a service for paying customers poses potentially contradictory solutions. No one suggests TSPs can or should be substitutes for PSAPs. But, in challenging circumstances that impact both public and private response, there is clear rationale why the two should plan for collaboration.

The Path Forward

The Northeast derecho demonstrates the need for deeper and broader redundancy and resiliency associated with 911. During the derecho, there were systemic 911 failures in Northern Virginia and West Virginia. Four northern Virginia PSAPs lost 911 service completely. A significant number of 911 systems and services were partially or completely down for up to several days. 911 centers experienced Automatic Location Information ('ALI') failure and the loss of administrative and backup telephone lines. Primary ALI links did not return until days after the storm. Relying on one entity, a carrier, to deliver emergency calls contradicts an era where alternative and diverse transmission providers exist. 911 is a core government service. The connected vehicle infrastructure may be able to play a critical supporting role to provide a partial or supplemental link.

That 911 centers in Northern Virginia were helpless for several days serves as a commencement point, and motivating factor, of engagement. There is a need to pursue a backup plan for delivering this core government service. A holistic approach, centered on public-private collaboration, needs to be initiated, most notably led by a national organization, such as the National Emergency Number Association, the Association of Public Safety Communications Officials and the National Association of State 911 Administrators. Such an endeavor could begin outlining the parameters of how TSPs can contribute, including a cost model, to improve 911 in emergent environments or during circumstances where alternative resources can contribute to enhanced safety.

For Further Information regarding this white paper- The Automobile and Emergency Communications- The Vehicle as an Emerging Communications Platform or any of Agero's services, please contact Gary Wallace, Vice President, Corporate Relations, at GWallace@Agero.com or 972.753.6230